

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

UBIQUITI NETWORKS, INC.,

Plaintiff,

v.

CAMBIUM NETWORKS, INC.;
CAMBIUM NETWORKS, LTD.;
BLIP NETWORKS, LLC;
WINNCOM TECHNOLOGIES, INC.;
SAKID AHMED; and DMITRY
MOISEEV.

Defendants.

Civil Action No.: 1:18-cv-05369

JURY TRIAL DEMANDED

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO FILE AMENDED COMPLAINT**

Plaintiff Ubiquiti Networks, Inc. ("Plaintiff"), by its undersigned counsel, respectfully files this motion seeking leave to extend the time for filing of Plaintiff's Amended Complaint by fourteen (14) days, until June 19, 2019, in this action against Defendants Cambium Networks, Inc., Cambium Networks, Ltd., Blip Networks, LLC, Winncom Technologies, Inc., Sakid Ahmed, and Dmitry Moiseev ("Defendants"), and states as follows in support thereof:

1. On May 22, 2019, the Court entered a minute entry order and accompanying Memorandum Opinion and Order in which it granted in part, and denied in part, Defendants' motion to dismiss Plaintiff's complaint in this action, and dismissed Plaintiff's complaint without prejudice. *See* ECF Dkt. Nos. 58 & 59. The Court further ordered that Plaintiff shall have until June 5, 2019 to file an amended complaint, and that if Plaintiff files an amended complaint, Defendant shall have until June 19, 2019 to file their response thereto. *See id.*

2. Plaintiff respectfully requests a fourteen (14) day extension of the deadline for Plaintiff to file an amended complaint. The requested extension is necessary in light of the

nature and amount of the work to be completed in connection with this filing, existing deadlines for other client matters that require the attention of counsel for Plaintiff, and the schedules of counsel during the intervening federal holiday.

3. This is Plaintiff's first request for extension of time to file this pleading, and the first request for extension of time requested by Plaintiff in this case.

4. The requested extension is sought for good cause and in good faith, and is not being brought for the purpose of delay. The granting of this motion will not prejudice any party.

5. A status hearing is currently scheduled in this action for June 11, 2019 at 9:00 a.m.; Plaintiff defers to the Court as to whether this status hearing should be rescheduled in light of the requested extension.

6. Plaintiff's counsel has communicated with Defendants' counsel regarding this extension request, and Defendants' counsel has informed Plaintiff that Defendants oppose the relief requested in this motion. A true and correct copy of the parties' correspondence with respect to this matter is attached as Exhibit A.

WHEREFORE, Plaintiff respectfully requests that the Court grant the foregoing Motion for Extension of Time to File Amended Complaint and enter an order extending the deadline for Plaintiff to file its Amended Complaint by fourteen (14) days to June 19, 2019.

Dated: May 24, 2019

Respectfully submitted,

FOX SWIBEL LEVIN & CARROLL LLP

/s/ Erik J. Ives

David Koropp (ARDC #6201442)

dkoropp@foxswibel.com

Jason Keener (ARDC #6280337)

jkeener@foxswibel.com
Erik J. Ives (ARDC #6289811)
eives@foxswibel.com
Fox Swibel Levin & Carroll LLP
200 W. Madison St., Suite 3000
Chicago, IL 60606

Attorneys for Plaintiff Ubiquiti Networks, Inc.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on May 24, 2019, he caused the foregoing document to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, using the Court's CM/ECF system, which is also served upon counsel for all parties of record.

/s/ Erik J. Ives
Erik J. Ives